

**IN THE U. S. DISTRICT COURT FOR  
THE NORTHERN DISTRICT OF ALABAMA  
SOUTHERN DIVISION**

<b>ALLEN HUGHES,</b>	)	
	)	
<b>Plaintiff,</b>	)	
	)	
<b>v.</b>	)	<b>Civil Action No.:</b>
	)	
<b>BUREAU OF COLLECTION</b>	)	
<b>RECOVERY, LLC</b>	)	
	)	
<b>Defendant.</b>	)	

**NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1441, Defendant Bureau of Collection Recovery (“BCR”) hereby removes this action to this Court. In support, BCR states the following grounds:

1. On or after March 17, 2012, BCR was served with Plaintiff’s Complaint in Civil Action No. CV-2012-900764 filed in the Circuit Court of Jefferson County, Alabama (the “State Court Action”).

2. Plaintiff’s Complaint purports to set forth a cause of action under the Fair Debt Collection Practices Act, 15 U.S.C. §§ 1692 *et seq.*, as well as state common law causes of action.

3. This Court has original jurisdiction over Plaintiff’s cause of action based on 15 U.S.C. §§ 1692, *et seq.*, as set forth in 28 U.S.C. § 1331 and 15 U.S.C.

§ 1692k(d). Pursuant to 28 U.S.C. § 1441, therefore, the State Court Action is removable to this Court. This Court has supplemental jurisdiction over any related state law claims under 28 U.S.C. § 1367.

4. BCR will file its Answer to Plaintiff's Complaint with the Clerk of the United States District Court for the Northern District of Alabama in the time prescribed by the Federal Rules of Civil Procedure.

5. A copy of all process, pleadings, and orders served upon BCR in the State Court Action is attached hereto as Exhibit A.

6. Thirty (30) days have not yet expired since BCR's receipt of Plaintiff's Complaint.

7. No other defendants were named or served with the Complaint in the State Court Action; therefore, BCR is not required to obtain another's consent and joinder in this Notice of Removal.

8. Promptly after filing of this Notice of Removal, BCR shall provide notice of the removal to Plaintiff through Plaintiff's attorneys of record in the State Court Action and to the Clerk of the Circuit Court of Jefferson County, as required by 28 U.S.C. § 1446(d).

DATED this 16th day of April, 2012.

/s/ Jason B. Tompkins  
One of the Attorneys for Defendant  
Bureau of Collection Recovery

**OF COUNSEL:**

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**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing has been served upon the following counsel of record by U.S. mail on this the 16th day of April, 2012:

Mr. John G. Watts  
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/s/ Jason B. Tompkins  
Of Counsel